

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

NATHANIEL HIERS,

Plaintiff,

v.

THE BOARD OF REGENTS OF THE
UNIVERSITY OF NORTH TEXAS SYSTEM,
et al.,

Defendants.

Civil Case No. 4:20-cv-00321-SDJ

**PLAINTIFF'S UNOPPOSED MOTION
TO EXCEED PAGE LIMIT AND EXTEND THE TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

Plaintiff respectfully asks this Court to extend the page limit for his response to Defendants' motion to dismiss by ten pages and to extend the deadline for that response by fourteen days. This would make Plaintiff's response of no more than forty pages due on August 27, 2020.

Local Rule 7(a)(1) limits dispositive motions and responses to them to thirty pages without leave of court. This Court granted Defendants ten additional pages for their motion to dismiss brief, which was filed July 30, 2020. To respond fully to Defendants' arguments regarding complex constitutional, jurisdictional, and state-law issues, Plaintiff also respectfully requests an identical ten-page extension.

Similarly, Plaintiff also asks this Court for a two-week extension of the default fourteen-day deadline under Local Rule 7(e) to respond to motions. Defendants received two extensions—a 30-day and 15-day extension, respectively—to juggle other pressing matters and to prepare their lengthy motion to dismiss. Plaintiff's counsel likewise have pressing deadlines in other matters, and thus need this extension of time to fully brief the many issues that Defendants raise.

Defendants have consented to both extensions.

Respectfully submitted on the 31st day of July, 2020.

/s/ Michael R. Ross

MICHAEL R. ROSS*
TYSON C. LANGHOFFER*
DAVID A. CORTMAN
ALLIANCE DEFENDING FREEDOM
20116 Ashbrook Place, Suite 250
Ashburn, VA 20147
Telephone: (480) 444-0020
Facsimile: (202) 347-3622
mross@ADFlegal.org
tlanghofer@ADFlegal.org
dcortman@ADFlegal.org

THOMAS S. BRANDON, JR.
TEXAS BAR NO. 02881400
**WHITAKER CHALK SWINDLE &
SCHWARTZ, PLLC**
301 Commerce Street, Suite 3500
Fort Worth, TX 76102
Telephone: (817) 878-0532
Facsimile: (817) 878-0501
tbrandon@whitakerchalk.com

**Admitted Pro Hac Vice*

Attorneys for Plaintiff Nathaniel Hiers

CERTIFICATE OF CONFERENCE

I certify that I conferred with Defendants' Counsel via email on July 30th, 2020 on this motion. Defendants' counsel stated that Defendant is unopposed to the relief sought in this motion.

/s/ Michael R. Ross

Michael R. Ross

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this foregoing motion has been served on Defendants by electronic notification through the ECF system of the United States District Court for the Eastern District of Texas, Sherman Division, on July 31, 2020.

/s/ Michael R. Ross

Michael R. Ross